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It would be very unfortunate, indeed, to apply the doctrines of *stare decisis* and *res adjudicata* to administrative rulings; and the Supreme Court of the United States has so held. *Pearson v. Williams*, 202 U. S. 281. Under this decision the present case is difficult to support.

ADMIRALTY — JURISDICTION — WORKMEN'S COMPENSATION LAW CONFLICTS WITH MARITIME LAW. — An award was given under the Workmen's Compensation Law of New York to the dependants of a stevedore accidentally killed while in the employ of the defendant. The case came to the United States Supreme Court on the ground (*inter alia*) that the Act conflicts with the general maritime law. CONSTITUTION, ART. III, § 2, ART. I, § 8. JUD. CODE, §§ 24, 256. *Held*, that in so far as the Act extends to matters under admiralty jurisdiction, it is unconstitutional. Holmes, Brandeis, Pitney, Clarke, JJ., dissenting. *Southern Pacific Co. v. Jensen*, 37 Sup. Ct. Rep. 524. Services of stevedores are maritime in their nature. *Atlantic Transportation Co. v. Imbrovek*, 234 U. S. 52. Congress has exclusive power to legislate concerning maritime matters. *The Roanoke*, 189 U. S. 185. See CHAPLIN, PRINCIPLES OF THE FEDERAL LAW, § 529. The states have a sphere of legislative power where uniformity is not essential, subject to supersedure by federal legislation, illustrated in the following cases. *Cooley v. Board of Wardens*, 12 How. 299; *The Lottawanna*, 21 Wall. 558; *Steamboat Co. v. Chase*, 16 Wall. 522. Since Congress has not legislated on the liability of the water carrier to the employee, it would seem that the states are at liberty to legislate in this field. See *Second Employers' Liability Cases*, 223 U. S. 1; *The Minn. Rate Cases*, 230 U. S. 352, 408. Workmen's Compensation acts have been sustained, as not in conflict with federal maritime jurisdiction. *Kennerson v. Thames Towboat Co.*, 89 Conn. 367; *Lindstrom v. Mutual S. S. Co.*, 132 Minn. 328; *Northern Pacific S. S. Co. v. Industrial Acc. Commission*, 163 Pac. 199 (Cal.); *Keithley v. Northern Pacific S. S. Co.*, 232 Fed. 255. Cf. *Berton v. Tietjen & Lang Dry Dock Co.*, 219 Fed. 763. But see *Schuede v. Zenith S. S. Co.*, 216 Fed. 566. *Neff v. Industrial Commission*, 164 N. W. 845 (Wis.) (following principal case), *contra*.

A secondary ground of the decision is that the Compensation Act attempts to give a remedy inconsistent with the clause of the judiciary act "saving to suitors . . . the right of a common-law remedy." This has been construed to mean a right to proceed *in personam* in a common-law court as distinguished from the right to proceed *in rem* according to the course in admiralty. *Knapp, etc. v. McCaffrey*, 177 U. S. 638; BENEDICTS' ADMIRALTY, 4 ed., § 128. In view of that construction the *dictum* of the principal case would seem to be erroneous. That it is at least undesirable is shown by the immediate action of Congress in amending the Judiciary Act so as to save "to claimants the rights and remedies under the Workmen's Compensation Law of any State," (S 2916) approved October 6, 1917. In view of the primary ground of the decision the validity of this amendment may well be questioned.

ADOPTION — RIGHT OF INHERITANCE — EFFECT OF A SUBSEQUENT ADOPTION ON THE RIGHT TO INHERIT UNDER A PRIOR ADOPTION. — A statute provides that the adopted "child shall . . . become . . . an heir at law" of the adopting parent, the same as if he were in fact the child of such parent. A child, legally adopted, was readopted by others with the consent of the first foster father. Upon the death of the latter, the right is claimed to inherit under the first adoption. Mich. C. L. 1897, § 8780. *Held*, that the readoption during the life of the first foster father destroyed the right to inherit from him. *In re Klapp's Estate*, 164 N. W. 381 (Mich.).

The right to inherit is not a necessary incident of the relation of parent and child. See *Calhoun v. Bryant*, 28 S. D. 266, 276, 133 N. W. 266, 271, 8 HARV. L. REV. 161, 162, 165. But that right is generally conferred on the